

APPEARANCES:

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INDEX TO WITNESS

Andrew R. Perrong
Examination by Mr. Gerow.....4

1 ANDREW R. PERRONG, ESQUIRE
2 called as a witness, having been duly sworn or
3 affirmed, was examined and testified as follows:

4 EXAMINATION

5 BY MR. GERROW:

6 Q. Good morning. I'm Charlie Gerow, and I am
7 here in my capacity as a defendant in the matter of
8 Andrew Perrong versus Charlie Gerow for Governor,
9 Charles Gerow individually and Marguerite Luksik.

10 Today we're taking the deposition of the
11 plaintiff, Andrew Perrong.

12 Mr. Perrong, have you been deposed before?

13 A. Yes.

14 Q. So you're familiar with what a deposition
15 entails?

16 A. Yes.

17 Q. Okay. So just the general instructions
18 would be that you need to form your answers audibly.
19 Hand gestures, nods of the head, et cetera, can't be
20 picked up by the stenographer. You understand that;
21 correct?

22 A. Yes.

23 Q. And if you don't understand a question,
24 you'll ask for clarification. If you answer the
25 question, it's assumed that you understood the
26 question. Okay?

1 A. Yes.

2 Q. And if you need to take a break for any
3 reason, you'll indicate that, but we ask that you not
4 take a break when an answer is impending. Okay?

5 A. Yes.

6 Q. And is there any reason why you can't give
7 testimony this morning?

8 A. No.

9 Q. Is there any impairment to your memory or
10 recollection today?

11 A. No.

12 Q. Have you had any alcohol or drugs that would
13 impair your ability to give testimony today?

14 A. No.

15 Q. Okay. All right. Could you, just for the
16 record, please state and spell your name?

17 A. Andrew, A-n-d-r-e-w; Roman, R-o-m-a-n;
18 Perrong, P-e-r-r-o-n-g.

19 Q. And what is your residence, Mr. Perrong?

20 A. My residential address is 1657 The Fairway,
21 No. 131, Jenkintown, Pennsylvania, 19046.

22 Q. And is that where you live?

23 A. No.

24 Q. Where do you live?

25 A. I live at 3551 Post Road, Huntingdon Valley,

1 Pennsylvania, 19006.

2 Q. Why do you use a different, quote/unquote,
3 residential address from where you actually live?

4 A. I use a residential address to receive mail
5 because I've been threatened multiple times by
6 multiple people because of my consumer protection
7 litigation and consumer advocacy.

8 Q. And are you employed?

9 A. Yes.

10 Q. And how are you employed?

11 A. I'm an attorney.

12 Q. You're an attorney?

13 A. Yes.

14 Q. And are you licensed to practice before the
15 Bar of Pennsylvania?

16 A. Yes.

17 Q. And when did you become licensed to practice
18 before the Bar of Pennsylvania?

19 A. October 10th of 2023.

20 Q. And what is your attorney ID number?

21 A. 333687.

22 Q. And prior to October 10th, 2023, how were
23 you employed?

24 A. I was a law student and I was also the owner
25 of a computer services -- freelance computer services

1 business, which I still do as well.

2 Q. Now, in your complaint, you list a phone
3 number as being 215-947-XXXX.

4 Do you have other phone numbers?

5 A. Yes.

6 Q. What are they?

7 A. I have other phone numbers, but they're not
8 relevant to this complaint.

9 Q. They are relevant to this. How many other
10 phone numbers do you have?

11 A. Personally, I have four other telephone
12 numbers. Five if you count the number that's -- that
13 I use for litigation on the complaint.

14 Q. And why is it that you have five different
15 phone numbers?

16 A. Because I have an iPhone and an Android. I
17 have two residential lines and a Voice Over IP line.

18 Q. Okay. And the number that you reference in
19 your complaint, the 215-947-XXXX number, when did you
20 acquire that number?

21 A. That number was acquired sometime in 2003, I
22 believe.

23 Q. And from whom did you acquire it?

24 A. From the telephone company.

25 Q. And which company was that?

1 A. From Verizon.

2 Q. And is it attached to a cell phone?

3 A. No.

4 Q. Is it attached to the VOIP?

5 A. It is a Voice Over IP number.

6 Q. And for what particular reason did you get a
7 VOIP attachment?

8 A. There's no particular reason. It's Voice
9 Over IP. Most telephone services nowadays are Voice
10 Over IP. Verizon is no longer even installing copper
11 landlines.

12 Q. And for what purpose do you use that
13 particular line?

14 A. Personal residential household use.

15 Q. Okay. Do you carry a device that's attached
16 to that number?

17 A. No.

18 Q. So where do you receive calls?

19 A. I can receive calls anywhere that my
20 telephone is plugged into an internet connection.

21 Q. So on the date and time, that would be
22 either May 6 or May 7, where was that line,
23 quote/unquote, plugged into?

24 A. I don't recall where it was plugged into.
25 It was plugged into multiple places.

1 Q. Did you have the phone that it was plugged
2 into with you on those dates?

3 A. I answered the call, so I was -- yes, it was
4 with me.

5 Q. So you say you answered the call. How did
6 it then record the call if you answered it?

7 A. I record all -- practically every call
8 that's inbound to that number, especially if it's
9 illegal.

10 Q. Are you aware of the rules of the statutes
11 of Pennsylvania regarding the recording of telephone
12 conversations?

13 A. Yes.

14 Q. So you didn't let it go to voicemail on
15 May 6 or May 7, you personally answered the call?

16 A. That's correct.

17 Q. And when you realized that it was not a
18 personal call, you stayed on the line; is that
19 correct?

20 A. That's correct.

21 Q. So on what basis do you allege that it
22 interfered with your quiet enjoyment of life on that
23 date when you stayed on the call once you realized
24 that it was an automated call?

25 A. If I recall, I had -- if I recall correctly,

1 I had pasta on the stove heating up, so I was forced
2 to leave the stove, an active hot stove, and answer a
3 pre-recorded robocall.

4 Q. But you didn't hang up?

5 A. That's correct.

6 Q. Okay. So you left the hot pasta on the
7 stove while you listened to this entire call?

8 A. Yes. I listened to the call to identify who
9 the caller was.

10 Q. Wasn't the caller identified right up front
11 in that conversation?

12 A. No.

13 Q. It wasn't. Okay.

14 How about the other date? There were two
15 dates that you ever you got calls on. Did you have
16 hot pasta on the stove the second date as well?

17 A. No.

18 Q. Where were you the second date?

19 A. At home.

20 Q. And what were you doing?

21 A. I don't recall.

22 Q. And when you realized that the call was an
23 automated call, you stayed on the line; is that
24 correct?

25 A. That's correct.

1 Q. Okay. Why did you do that?

2 A. I wanted to identify the caller.

3 Q. Okay. The caller was identified right up
4 front, was it not?

5 A. In that second call, there was a
6 pre-recorded message. But again, obviously, I need
7 to stay on the call for long enough to identify who
8 the caller is, who the other participants on the call
9 are and the nature of the call.

10 Q. Okay. Now, in the first call, your averment
11 alleges that the pre-recorded call stated:

12 Hello. This is pro-life leader Peg Luksik,
13 223-322-0908. On Saturday, May 7th, between the
14 hours of 7:30 and 8:30 p.m., Congressman G.T.
15 Thompson will be hosting a live interactive town hall
16 meeting over the telephone with his choice for
17 Republican governor, Charlie Gerow.

18 Did you need to stay on the line past that?

19 A. Yes.

20 Q. Why?

21 A. Because I wanted to see whether or not there
22 were required campaign disclosures at the end of the
23 call and see who paid for the call because sometimes
24 there are entities which make calls or say that
25 they're making calls without properly identifying

1 who's the payor for the call. Even if they do
2 identify who the person who paid for the call is, I
3 need to identify who's paying for the call and who's
4 responsible for the call.

5 Q. Okay. And in the second call, the
6 conversation, according to your averment, began:

7 Hello. This is pro-life leader Peg Luksik
8 at 223-322-0908. Congressman G.T. Thompson is
9 currently conducting a live toll-free town hall
10 meeting over the phone with his choice for Republican
11 governor, Charlie Gerow.

12 why did you need to go beyond that
13 particular call?

14 A. Same reason, because there's often very many
15 players involved in calls. People that authorize
16 calls might not be the same people as pay for calls.
17 There's issues of vicarious liability involved, so I
18 want to make sure that I have all the facts to
19 investigate the calls prior to filing a suit, as is
20 my obligation to investigate.

21 Q. So have you filed suits like this before?

22 A. Yes.

23 Q. When was the first time you filed a suit
24 under the statute that you filed this suit under, the
25 TCPA?

1 A. I don't recall. Sometime in 2015.

2 Q. You don't recall the first time you filed a
3 suit?

4 A. I don't recall the -- the precise date. I
5 believe it was sometime in 2015 or 2014 maybe.

6 Q. Okay. And where did you file that?

7 A. That would have been in the magisterial
8 district court.

9 Q. Where?

10 A. In my local magisterial district court.

11 Q. And in 2015, how many suits did you file
12 under the TCPA?

13 A. I don't know.

14 Q. You don't know how many suits you filed?

15 A. I don't know how many suits it was. It was
16 somewhere maybe around five.

17 Q. Maybe around five?

18 A. That's correct.

19 Q. Okay. Did you file any in 2016?

20 A. That's correct.

21 Q. And how many did you file in 2016?

22 A. I don't recall. It's a matter of public
23 record.

24 Q. You don't recall how many you filed in 2016?

25 A. No.

1 Q. You have no recollection of how many
2 lawsuits you filed in a given year?

3 A. I don't know the number. It's a matter of
4 public record.

5 Q. I understand it's a matter of public record.
6 That's not what I asked. I asked you if you have any
7 recollection of how many lawsuits you filed in the
8 year 2016.

9 A. No.

10 Q. Is it fair to say it was more than five?

11 A. Yes.

12 Q. Is it fair to say it's more than ten?

13 A. I don't know.

14 Q. I'm going to remind you that you're under
15 oath. You're going to tell me again that you don't
16 know whether it was more or less than ten lawsuits
17 that you filed in the year 2016 under the provisions
18 of this statute?

19 A. I don't recall the exact number, no.

20 Q. And did you file any in 2017?

21 A. Yes.

22 Q. And how many did you file in 2017?

23 A. Somewhere between ten and 20.

24 Q. And did you file any in 2018?

25 A. Yes.

1 Q. And how many did you file in 2018?

2 A. I don't know.

3 Q. You knew how many you filed in 2017, but you
4 don't know how many you filed in 2018?

5 A. I don't know by year how many lawsuits I
6 filed.

7 Q. How many have you filed in total?

8 A. Somewhere around 150.

9 Q. Around 150? More or less than 150?

10 A. I don't know. It's somewhere around 150.

11 Q. Okay. And as a result of these 150
12 lawsuits, how many settlements have you made?

13 A. Somewhere around 140.

14 Q. And what's the aggregate amount of those
15 settlements that you've recovered?

16 A. I don't know.

17 Q. You don't know?

18 A. I don't know.

19 Q. Let's go to the most recent year. How many
20 suits have you filed under the TCPA in 2023?

21 A. I don't recall.

22 Q. You don't recall how many lawsuits you filed
23 this year?

24 A. Personally or as an attorney?

25 Q. On your own behalf.

1 A. I don't recall. Somewhere around five.

2 Q. Somewhere around five. And how many of
3 those are pending?

4 A. I don't recall.

5 Q. You're an attorney. You've filed lawsuits
6 this year within the past 11 months, and it's your
7 testimony that you don't know how many are pending
8 currently?

9 A. I don't know whether or not they were filed
10 in 2022. I have some that are pending from 2022. I
11 have some pending from 2023.

12 Q. Well, I asked you how many you filed in
13 2023.

14 A. I don't know.

15 Q. You said somewhere around five.

16 A. I don't know where -- let me rephrase.

17 I don't know which one of those were filed
18 at the end of 2022, the beginning of 2023, and I
19 don't have anything in front of me to recall with
20 specificity that you're requesting the suits that
21 I've filed in 2023.

22 Q. How many did you file in 2022?

23 A. I don't recall.

24 Q. How many did you file in 2021?

25 A. I don't recall.

1 Q. But you did file suits under the TCPA those
2 years?

3 A. That's correct.

4 Q. You filed multiple suits?

5 A. That's correct.

6 Q. And in addition to filing suits, you've made
7 settlements with people that you threatened to sue;
8 correct?

9 A. That's correct.

10 Q. And how many settlements have you made with
11 folks that you threatened to sue but didn't actually
12 file suit against?

13 A. I don't recall.

14 Q. Is it fair to say it's more than 150?

15 A. Yes.

16 Q. Is it fair to say it's more than 200?

17 A. I don't recall.

18 Q. Is it fair to say that you have created a
19 cottage industry out of filing suit under the TCPA?

20 A. No.

21 Q. Why is that unfair?

22 A. Because I have a full-time job. I now have
23 a different full-time job as an attorney. It's not a
24 cottage industry.

25 Q. You didn't have a full-time job. You were a

1 law student and you had a computer company. Which
2 was your full-time job?

3 A. I was a part-time law student, evening law
4 student, and I had a full-time computer company.

5 Q. Okay. How much money have you received from
6 the settlements that you have made over the course of
7 the past eight years?

8 A. I don't know.

9 Q. You don't know. Do you file a federal tax
10 return?

11 A. Yes.

12 Q. Do you file these on your federal tax
13 return?

14 A. Yes.

15 Q. Are you willing to produce those tax
16 returns?

17 A. You can send me a discovery request and I'll
18 respond appropriately.

19 Q. I asked if you're willing to do that.

20 A. My answer is you can send me a request.

21 Q. I'm asking you a simple yes or no question.
22 Are you willing to produce those tax returns?

23 A. I will object to the production of any tax
24 returns.

25 Q. But it's fair to say that you have recovered

1 a very significant amount of money?

2 A. No.

3 Q. It's not?

4 A. No.

5 Q. But you don't know how much it is?

6 A. I know it's not significant.

7 Q. Well, what would you consider significant?

8 A. I don't know -- what would you consider
9 significant?

10 Q. No, it's my deposition, I get to ask the
11 questions. You get to answer them.

12 what would you consider to be significant?
13 You said it wasn't significant. What would you
14 consider to be significant?

15 A. I'm going to object to the form.

16 Q. Okay. Your objection is noted, now please
17 answer the question. What would you consider to be
18 significant?

19 A. It's unclear what you mean as to
20 significant.

21 Q. Mr. Perrong, maybe the English language is a
22 little tough for you today. I'm asking you what you
23 would consider to be significant.

24 A. I don't understand what --

25 Q. You don't understand the question?

1 A. What your --

2 Q. You don't understand the question?

3 A. I don't understand your question, no.

4 Q. You said that the number was not
5 significant. What number would be necessary for you
6 to consider it to be significant?

7 A. You stated that.

8 Q. No, no, no, no, no. Please answer the
9 question. Don't tell me what I said. Answer the
10 question.

11 A. I don't -- I don't understand what
12 significant is.

13 Q. I understand that. Then why would you say
14 that it wasn't significant if you don't understand
15 what significant is?

16 A. You used the word significant first.

17 Q. Why would you say it wasn't if you didn't
18 understand what the -- what the word was? You didn't
19 say I don't understand what significant is.

20 We discussed that as one of the rules of
21 this proceeding at the beginning, and you didn't say
22 I don't understand the question. You said it wasn't
23 significant. Isn't that correct?

24 A. You asked me --

25 Q. Isn't that correct?

1 A. You asked me --

2 Q. Isn't that correct?

3 A. You asked --

4 Q. Isn't --

5 A. I'm going to object to the form.

6 Q. Mr. Perrong, please answer my question.

7 Isn't that correct?

8 A. I'm going to object to the form.

9 Q. To the form of what?

10 A. To the form of the question.

11 Q. The form of the question is, isn't that
12 correct? That's about as basic as it can possibly
13 be.

14 A. And no, it's not correct. Your
15 characterization is not correct. The stenographer
16 notes that it's not correct, and you can look at the
17 transcript and you'll see that you asked -- you
18 brought up the term significant first.

19 Q. I asked you if it was significant. You said
20 it was not. Is that incorrect?

21 A. That is what I said.

22 Q. Okay. So you understood the term
23 significant when you answered the question. Why
24 can't you tell us now what you understood significant
25 to be?

1 A. I understand significant in the common
2 English language term. I don't believe I associated
3 any number to significant at the time that you asked
4 the question.

5 Q. So you didn't really answer the question
6 truthfully, did you, Mr. Perrong?

7 A. I did.

8 Q. Okay.

9 A. I answered the question in terms of the
10 common English language meaning of significant
11 without associating a number to the term significant.

12 Q. Okay. Now, you allege that the defendants
13 utilized an automatic telephone dialing system; is
14 that correct?

15 A. Correct.

16 Q. On what basis did you make that averment?

17 A. The call was pre-recorded. It was sent
18 using some form of random or sequential number
19 generation functionality in addition to being
20 prerecorded.

21 Q. Now, you refer in your complaint to an
22 entity called Tele-Town Hall; is that correct?

23 A. Correct.

24 Q. And it is your understanding that that's an
25 independent company?

1 A. It's my understanding that it's a company
2 that was hired by yourself and the campaign to make
3 the robocalls.

4 Q. Okay. And on what basis do you say that it
5 was hired by me personally?

6 A. You recorded the calls at issue.

7 Q. But that wouldn't necessarily mean that I
8 hired them, would it?

9 A. It would at least lend to the inference that
10 the calls were authorized by you.

11 Q. Did you do anything to investigate whether
12 or not I had hired this company to do these -- this
13 calling?

14 A. Yes.

15 Q. And what investigation did you do?

16 A. I spoke to the counsel for Tele-Town Hall.

17 Q. And who was that?

18 A. I don't recall their name off the top of my
19 head.

20 Q. And when did you speak to the counsel for
21 Tele-Town Hall?

22 A. Shortly before the filing of the complaint.

23 Q. And that was in October of 2022?

24 A. If that's shortly before the filing of the
25 complaint, then yes.

1 Q. Do you know when you filed the complaint?

2 A. Sometime in 2022. I don't know the exact
3 date.

4 Q. You don't know when. Okay.

5 And when you spoke to counsel, what did you
6 ask them?

7 A. I inquired to ascertain the nature of the
8 calls, why they were placed to me and who authorized
9 the calls.

10 Q. Now, when you say authorized, authorized or
11 hired and paid for, what do you mean by authorized?

12 A. Authorized and hired and paid for, if they
13 are, in fact, the same person, if they're a different
14 person. I wanted to get to the bottom of why I was
15 receiving these unwanted calls.

16 Q. And what did counsel tell you? Who did
17 counsel tell you authorized the calls?

18 A. Counsel stated that Tele-Town Hall was hired
19 by --

20 Q. No, I didn't ask that. I asked who did they
21 tell you authorized the calls.

22 A. They didn't directly tell me who authorized
23 the calls.

24 Q. And who did they tell you hired them to make
25 the calls?

1 A. Charles Gerow and the Gerow campaign.

2 Q. They told you that Charles Gerow hired them
3 to do this? They told you that?

4 A. They said that they were speaking to
5 Mr. Gerow and the Gerow campaign.

6 Q. Counsel for Tele-Town Hall told you that
7 they spoke to me personally?

8 A. They -- I don't recall what the e-mail said
9 exactly. Something to the effect of Charles Gerow
10 and the Gerow campaign or Charles Gerow and his folks
11 at the Gerow campaign or something to that effect.

12 Q. Do you have that e-mail?

13 A. Yes.

14 Q. Are you willing to produce that e-mail?

15 A. I will need to review it for potential
16 privilege and other issues.

17 Q. What privilege would exist?

18 A. There are confidential settlement
19 communications under Rule 408 for one.

20 Q. So you had a settlement arrangement with
21 Tele-Town Hall?

22 A. That's correct.

23 Q. And they paid you?

24 A. That's correct.

25 Q. How much did they pay you?

1 A. I don't recall.

2 Q. You don't recall, Mr. Perrong, how much they
3 paid you? Do you really expect us to believe that?

4 A. I don't recall exactly. And furthermore,
5 I'm going to object on the grounds that it's -- even
6 if I did recall, that the amount would be protected
7 under Rule 408.

8 Q. We can take that up with a judge if you
9 would like to.

10 A. I don't recall at this moment how much they
11 paid me. That's my answer. And furthermore, I'll
12 note my objection that it's protected under Rule 408.

13 Q. But they did pay you? They did pay you?

14 A. Yes, they did.

15 Q. So on that basis, you determined not to sue
16 them?

17 A. The agreement included a release of my
18 claims against Tele-Town Hall.

19 Q. And you don't recall the name of the counsel
20 that you spoke to?

21 A. I only recall that he was at the law firm of
22 ArentFox Schiff.

23 Q. Let me give you a second to see if you can
24 remember that name.

25 A. I won't remember.

1 Q. And that counsel told you that he had spoken
2 to me personally?

3 A. I don't recall exactly what the counsel
4 said. As I stated, the counsel stated something to
5 the effect of he spoke with the folks over at the
6 Gerow -- Gerow and the folks over at the Gerow
7 campaign.

8 Q. Did he tell you that he spoke to,
9 quote/unquote, the folks or did he tell you that he
10 spoke with me personally?

11 A. Again, I'm going to object to the form
12 because --

13 Q. The form is very simple. Did he tell you
14 that he spoke with, quote/unquote, the folks at the
15 Gerow campaign or that he spoke with me personally?

16 A. I recall the fact that the e-mail had the
17 name Gerow in it and it had the term the folks in it.
18 Exactly what the e-mail said, I don't have it in
19 front of me. I can't recall with specificity exactly
20 what the e-mail said.

21 Q. And did you ask him to define for you who
22 the folks were?

23 A. No.

24 Q. Why not?

25 A. I didn't think it was important at the time.

1 Q. You didn't think it was important to
2 determine who actually authorized and paid for these
3 calls?

4 A. This was in the context of settlement
5 negotiations. And Mr. -- the attorney over --

6 Q. Mr. what's his name?

7 A. Mr. Arent -- was going to say Mr. ArentFox
8 Schiff, somebody over at the ArentFox Schiff law firm
9 who was attempting to negotiate a global settlement
10 on behalf of the Gerow campaign and Tele-Town --

11 Q. Wait a minute. You're telling me that an
12 attorney for ArentFox Schiff indicated to you that he
13 was trying to settle on behalf of the Gerow campaign?

14 A. That's correct.

15 Q. I'm going to need to know the name of that
16 attorney.

17 And you indicated that this was a settlement
18 conversation?

19 A. These were settlement negotiations. And I
20 believe that the substance of those conversations was
21 that there was a draft settlement agreement that was
22 sent over to the Gerow campaign and that the Gerow
23 campaign was going to take a look at it, but they
24 were coming up against some campaign financing
25 deadlines and were going to get back to me on whether

1 or not they would be willing to settle.

2 Q. Now, the question that I asked you
3 originally was whether or not you had done any
4 investigative work. This was a settlement
5 conversation that apparently was started by this
6 attorney at ArentFox Schiff; is that correct?

7 A. That's correct.

8 Q. So you didn't do any independent
9 investigation into this, did you?

10 A. No, I sent an investigative --

11 Q. No is fine.

12 A. I sent an --

13 Q. No is fine.

14 A. Let me correct --

15 Q. No is fine.

16 A. Let me correct --

17 Q. I asked you if you had --

18 A. I misspoke.

19 Q. I asked you if you had made any independent
20 investigation, and you said no.

21 A. I did make an independent investigation.

22 Q. Well, why did you say no when I asked you if
23 you made any independent investigation?

24 A. Because I misspoke. Let me finish. I made
25 an independent investigation. I spoke to -- I sent

1 an investigative e-mail to Tele-Town Hall. As a
2 result of that investigative e-mail, I received
3 contact from this attorney at ArentFox Schiff.

4 Q. What was the nature of the, quote/unquote,
5 investigative e-mail?

6 A. I was seeking any information they had on
7 possible consent to contact my number with a
8 pre-recorded call.

9 Q. Anything other than that?

10 A. I also requested not to be called in the
11 future.

12 Q. Okay. But you didn't ask any questions
13 beyond that?

14 A. I also requested a copy of Tele-Town Hall's
15 do not call policy.

16 Q. Okay. But you didn't ask any questions
17 beyond that?

18 A. I also asked whether or not there was any
19 party that they contend placed the calls or if I, for
20 some reason, might have had the wrong company if that
21 was their contentions.

22 Q. Anything else that you asked them?

23 A. Not that I recall.

24 Q. Now, you allege in your complaint that I
25 personally, Charles R. Gerow, quote, directed the

1 illegal robocalls complained of.

2 On what basis do you make that averment?

3 A. The fact that the calls were recorded by you
4 and that they were sent from your campaign, so it
5 makes sense that because they were sent from your
6 campaign, I would not see any reason why you would
7 not authorize something that your campaign would send
8 out.

9 Q. Now, the message that was recorded using my
10 voice could have been used anywhere; correct?

11 A. I'm going to object to the form. I don't
12 understand what you mean used anywhere. It was
13 obviously a pre-recorded voice.

14 Q. I pre-recorded all sorts of messages every
15 single day.

16 Your averment says that Defendant Gerow came
17 on the line and said, quote, I'm a strong supporter
18 of the Second Amendment and life member of the
19 National Rifle Association. And if anybody wants to
20 see how deeply committed I am to the issue, they can
21 go to my website, CharlieForGovernor.com, and see a
22 picture of my 98-year-old mother holding her AR-15.

23 Was there anything else that my voice
24 recording had on that message?

25 A. There might have been other recordings on

1 the call.

2 Q. You don't allege any though, do you?

3 A. I do not allege anything in the limited fact
4 pleading of the complaint, no.

5 Q. And that message could have been used
6 anywhere, couldn't it?

7 A. As I recall, the call lasted for somewhere
8 around --

9 Q. I didn't ask how long the call lasted for, I
10 asked whether or not -- we'll come back to that.

11 I asked whether or not that call, that
12 message, could have been used anywhere.

13 A. That message could have been --

14 Q. It could have been used anywhere, couldn't
15 it?

16 A. I recall in your deposition that you stated
17 that you recorded that message for the call.

18 Q. Now, you said the call lasted an hour.

19 A. It's my understanding from my communications
20 with Tele-Town Hall that the total duration of the
21 town hall was around about an hour.

22 Q. Did you stay on the line for that entire
23 hour?

24 A. No.

25 Q. How long did you stay on the line?

1 A. I don't recall.

2 Q. So did you do any investigation at all into
3 whether or not I personally, quote, directed and
4 authorized the selection of the actual numbers to be
5 called?

6 A. Yes.

7 Q. And where did you do that investigation?

8 A. Through my discussions with Tele-Town Hall,
9 it's my understanding that Tele-Town Hall does not
10 itself provide lists of numbers. It is provided
11 lists of telephone numbers by campaigns, by callers
12 and the various sorts of persons that would direct
13 the calls. And they essentially send out whatever
14 lists of calls they're instructed to.

15 Q. And did you ask where they received the list
16 of calls that they made on behalf of the Charlie for
17 Governor campaign?

18 A. No.

19 Q. You didn't ask that?

20 A. No.

21 Q. So on what basis would you say that I
22 personally directed and authorized the selection of
23 those calls?

24 A. It was your campaign that engaged with
25 Tele-Town Hall and provided them a list.

1 Q. Wait a minute. How do you know that they
2 provided them the list?

3 A. Because Tele-Town Hall does not itself
4 provide lists, so that list had to come from
5 somewhere outside Tele-Town Hall. And given that
6 Tele-Town Hall was hired by whoever it was hired by,
7 those individuals, as I allege in the complaint the
8 Gerow campaign, which you headed, that made the
9 calls -- that sent -- rather that sent the calling
10 lists to Tele-Town Hall.

11 Q. You didn't do any investigation at all, did
12 you?

13 A. I did investigation.

14 Q. Tell me again what investigation you did to
15 determine where the lists came from that Tele-Town
16 Hall called on May 6 and May 7 on behalf of the
17 Charlie for Governor campaign.

18 A. Tele-Town Hall indicated to me that the
19 lists did not originate from them and that their
20 client, the Gerow campaign, provided the list to
21 call.

22 Q. Okay. And when you say the Gerow campaign,
23 who at the Gerow campaign?

24 A. That information was not provided to me.

25 Q. Okay. So you have no basis on which to say

1 that I personally did it, do you?

2 A. I do.

3 Q. What's that basis?

4 A. I'm going to object to the form.

5 Q. What is the basis upon which you would
6 allege that Charles R. Gerow personally directed and
7 authorized the selection of the calls to be made?

8 A. The fact that Charles Gerow was the
9 candidate running under the Charles for Governor or
10 Charlie for Governor campaign and the fact that if I
11 was running a campaign --

12 Q. No, no, no, no. Please don't conjecture
13 about what you would do.

14 I'm asking again specifically, Mr. Perrong,
15 on what basis did you make the averment that
16 Charles R. Gerow personally directed and authorized
17 the selection of the calls to be made on May 6 or
18 May 7th?

19 A. I'm going to object to the form, and common
20 knowledge of how political campaigns operate.

21 Q. And you're an expert in how campaigns
22 operate?

23 A. No.

24 Q. Okay. And did you consult an expert prior
25 to filing this complaint?

1 A. No. I relied on my common knowledge, basis
2 and experience.

3 Q. Okay. But you have no specific knowledge
4 whatsoever as to whether or not Charles R. Gerow
5 personally authorized or directed these calls to be
6 made?

7 A. Apart from the fact that Charles R. Gerow
8 recorded the calls, no.

9 Q. Okay. And had you ever had any contact with
10 Tele-Town Hall prior to the issues complained of in
11 this matter?

12 A. No.

13 Q. You had never dealt with Tele-Town Hall
14 previous to this complaint?

15 A. Not to my recollection, no.

16 Q. There are several parties that are named
17 defendants in this action. Charlie for Governor,
18 have you made actual service on Charlie for Governor?

19 A. Yes.

20 Q. When was that service made?

21 A. I don't recall. It would be on the docket.

22 Q. And how was it made?

23 A. Personally.

24 Q. And to whom was it made?

25 A. To your -- I -- I don't recall. I was going

1 to say to yourself, but at this moment I'm not a
2 hundred percent sure. I need to check the return of
3 service, so I don't want to say.

4 Q. Service on myself would not be service on
5 Charlie for Governor, to be very clear about that,
6 would it?

7 A. I would need to look at the rules and see
8 whether or not it would, but it's my understanding
9 that if you were served personally, that would
10 constitute good service on the Charles for Governor
11 campaign.

12 Q. Now, you allege in your complaint that
13 Charlie for Governor was a political action
14 committee; is that correct?

15 A. Yes. Or actually, let me rephrase. I
16 believe that that is an allegation in the complaint.
17 I'm not a hundred percent sure exactly how the
18 political action committees operate in Pennsylvania,
19 the exact precise terminology of that.

20 Q. Right. So you made that averment without
21 doing any investigation whatsoever as to how Charlie
22 for Governor was legally constituted, didn't you?

23 A. No. I investigated and I saw that it was
24 registered as a committee, Charlie for Governor
25 Committee, with the Pennsylvania Department of State.

1 Q. Right. But was it registered as a political
2 action committee?

3 A. It's my understanding that it was registered
4 as a political action committee with the Pennsylvania
5 Department of State.

6 Q. That's your understanding?

7 A. Yes.

8 Q. As a lawyer, that's your understanding?

9 A. I was not a lawyer at the time that I filed
10 the complaint.

11 Q. You were in your final year of law school?

12 A. Correct.

13 Q. And you didn't do any due diligence to
14 determine how Charlie for Governor was constituted
15 legally?

16 A. I'm going to object to the form as asked and
17 answered. Furthermore, I did investigate how Charlie
18 for Governor was constituted, as I said, by going
19 onto the Pennsylvania Department of State's website
20 and verifying that it was an authorized political
21 action committee for the purpose of your candidacy
22 for governor.

23 Q. And at the time you filed this complaint,
24 did you do any investigative work to determine
25 whether or not Charlie for Governor still existed?

1 A. Yes.

2 Q. And at the time of the filing of this
3 complaint, did it still exist?

4 A. According to the documents I reviewed on the
5 Secretary of State's website, I did not see any
6 information to indicate that it was closed or
7 dissolved in any manner.

8 Q. When did you do that?

9 A. Sometime shortly before the filing of the
10 complaint.

11 Q. So sometime in October of 2022?

12 A. Or perhaps in September or August of 2022.

13 Q. But in August, September or October, your
14 testimony is that you saw nothing on the Department
15 of State's website to indicate that Charlie for
16 Governor no longer was in existence?

17 A. Not to my recollection.

18 Q. Not to your recollection or do you have a
19 recollection?

20 A. I don't recall exactly when it was, but I
21 recall that I did not see anything to indicate that
22 it was administratively dissolved. And even if it
23 was, I still would have filed the suit because,
24 again, dissolving an entity does nothing if the
25 entity is still liable. But I -- I believe it was

1 still active in some capacity at the time that I
2 checked.

3 Q. And on what basis do you believe it was
4 still operative in some capacity?

5 A. There was nothing to indicate that it was
6 closed or dissolved.

7 Q. Nothing?

8 A. There was nothing on the website to indicate
9 that it was closed or dissolved.

10 Q. And Marguerite Luksik, otherwise known as
11 Peg Luksik, is also a named defendant; is that
12 correct?

13 A. Correct.

14 Q. And have you made service on her?

15 A. No.

16 Q. And you're familiar with the provisions of
17 the rules regarding service?

18 A. Yes.

19 Q. You indicated that the first suit you filed
20 under the TCPA was filed in a magisterial district
21 court; is that correct?

22 A. Correct.

23 Q. Why did you file this in the United States
24 District Court for the Eastern District of
25 Pennsylvania?

1 A. There's federal-questioned jurisdiction over
2 the claims at issue.

3 Q. Why didn't you file it in the magisterial
4 district court?

5 A. Because there's federal issues.

6 Q. Weren't there federal issues in the prior
7 complaint?

8 A. State courts have concurrent jurisdiction
9 with federal courts over these claims.

10 Q. I appreciate the law lesson, but you filed
11 an action under the TCPA federal statute in
12 magisterial district court. Why didn't you file this
13 one in magisterial district court?

14 A. I'm going to object as to privilege.

15 Q. What privilege did you have in October of
16 2022?

17 A. Pro se litigation and trial preparation
18 privilege.

19 Q. I don't think I have anything further.

20 I assume that you want to read and sign?

21 A. Read and sign, 30 days, please, with no mini
22 transcript. Just the full version, please.

23 Could we get a formal adjournment on the
24 record, please, stating that the deposition is
25 concluded? I don't think that it was clear.

1 MR. GERROW: Sorry. It is now 10:10 a.m.
2 The deposition of Andrew Perrong, plaintiff in this
3 matter, is now concluded.

4 (The deposition concluded at 10:10 a.m.)
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1 COUNTY OF LANCASTER: SS

2 COMMONWEALTH OF PENNSYLVANIA :

3 I, Cathy Mertz, Registered Merit Reporter,
4 Certified Realtime Reporter and Notary Public, do
5 hereby certify that personally appeared before me
6 ANDREW R. PERRONG, ESQUIRE, the witness, being by me
7 first duly sworn or affirmed to testify to the truth,
8 the whole truth and nothing but the truth, in answer
9 to the oral questions propounded to him by the
10 attorneys for the respective parties, testified as
11 set forth in the foregoing deposition.

12 I further certify that before the taking of said
13 deposition, the above witness was duly sworn or
14 affirmed, that the questions and answers were taken
15 down stenographically by Cathy Mertz, RMR, CRR,
16 Lancaster, PA, approved and agreed to, and afterwards
17 reduced to print by means of computer-aided
18 transcription under the direction of the aforesaid
19 reporter.

20 In testimony whereof, I have hereunto subscribed
21 my hand this 4th day of December 2023.

22
23 
24 Cathy S. Mertz, RMR, CRR
25 Notary Public
My Commission Expires
January 23, 2024.

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